

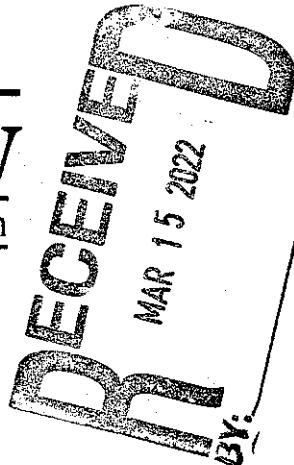
Exhibit A



7831-Glenroy Rd. Ste 350
Edina, MN 55439-3117



Zemel Law
Consumer Protection



Manager and/or Officer:
Radius Global Solutions, LLC.
7831 Glenroy Rd Ste 250
Edina, MN 55439-3117

DANIEL ZEMEL, ESQ. (NY, NJ)
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March 1st, 2022

**RE: Service of Process – Jasmine Mhrez v. Radius Global Solutions, LLC.,
Case #: HUD-L-000728-22**

Enclosed please find Summons and Complaint for the above referenced matter.

Very truly yours,

Daniel Zemel

Daniel Zemel, Esq.

SUPERIOR COURT OF THE STATE OF NEW JERSEY
HUDSON COUNTY

JASMINE MHREZ,

Plaintiff,

- against -

CASE NO HUD-L-000728-22

SUMMONS

RADIUS GLOBAL SOLUTIONS, LLC.,
Defendant.

To the above-named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorneys within thirty-five (35) days after the service of this summons, exclusive of the day of service; and in case of your failure to appear or answer, judgment will be taken against you by default for the relief as demanded in the complaint. The nature of this action is negligence. The relief sought is damages. Upon your failure to appear, judgment will be taken against you by default together with the costs of this action.

Dated: March 1st, 2022

/s/ Daniel Zemel
Daniel Zemel, Esq.
NJ ID#111402014
Zemel Law LLC
660 Broadway
Paterson, New Jersey 07514
T: (862) 227-3106
Attorneys for Plaintiff

TO: Radius Global Solutions, LLC.
7831 Glenroy Rd Ste 250
Edina, MN 55439-3117

Zemel Law LLC

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Attorneys for Plaintiff

JASMINE MHREZ

Plaintiff,

vs.

RADIUS GLOBAL SOLUTIONS, LLC.,

Defendant.

) SUPERIOR COURT OF NEW JERSEY
) HUDSON COUNTY
)
) Case No.
)
)
) **COMPLAINT**
)
)

Plaintiff, Jasmine Mhrez (hereinafter "Plaintiff") alleges:

PRELIMINARY STATEMENT

1. This is an action for damages arising from Defendant's violations of the Fair Debt Collections Practices Act, 15 U.S.C. §1692 *et seq.* (hereinafter "FDCPA").

JURISDICTION AND VENUE

2. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331.
3. Venue is proper in this district under 28 U.S.C. § 1331(b).

PARTIES

4. Plaintiff is a natural person who at all relevant times has resided in Guttenberg, New Jersey and is a "consumer" as the phrase is defined under 15 U.S.C. §1692(a) of the FDCPA.

5. Radius Global Solutions, LLC., (“RGS” “Defendant”), is a corporation that regularly conducts business in New Jersey. Defendant is a “debt collector” as the phrase is defined and applied under 15 U.S.C. §1692(a) of the FDCPA in that they regularly attempt to collect on debts primarily incurred for personal, family or household purposes.

FACTUAL STATEMENT

6. On a date better known to Defendant, Plaintiff Mhrez allegedly incurred a medical debt.
7. The debt allegedly incurred was for personal, familial, and household purposes.
8. The debt was then transmitted to RGS for collections.
9. In an attempt to collect the debt, Defendant sent Plaintiff a collection letter dated November 19th, 2021.
10. The letter was not sent from Defendant itself; Defendant utilized a third-party vendor to send the letter.
11. In doing so, Defendant disclosed Plaintiff’s personal information to a third party in violation of the FDCPA, including the fact that Plaintiff owed a medical debt.

COUNT I
VIOLATION OF THE FAIR DEBT COLLECTION PRACTICES ACT
15 U.S.C. § 1692 et seq.

12. Plaintiff repeats, re-alleges, and re-asserts the allegations contained in the above paragraphs and incorporates them as if specifically set forth at length herein.
13. Defendant’s actions are in violation of 15 U.S.C. § 1692c(b).

WHEREFORE, Plaintiff, Jasmine Mhrez respectfully requests that this Court do the following for the benefit of Plaintiff:

- A. Enter judgment against Defendant for statutory damages pursuant to the FDCPA;
- B. Award costs and reasonable attorneys' fees;
- C. Grant such other and further relief as may be just and proper.

JURY TRIAL DEMAND

Plaintiff demands a jury trial on all issues so triable.

Dated this March 1st, 2022.

Respectfully Submitted,

/s/ Daniel Zemel
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